

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

**CAPTION IN COMPLIANCE WITH D.N.J. LBR
9004-2(C)**

THE LAW OFFICE OF EDWARD HANRATTY
EDWARD HANRATTY, ESQ. (052151997)
57 W. MAIN STREET, SUITE 2D
FREEHOLD NJ 07728
TEL: 732-866-6655

IN RE:

CHRISTOPHER MICHAEL JANKOSKI

CASE NO.: 24-16538
HEARING DATE:
JUDGE: MBK

**CERTIFICATION OF EDWARD HANRATTY, ESQ. IN SUPPORT OF THE
MOTION TO VACATE DISMISSAL**

I, Edward Hanratty, Esq., attorney for the debtor in the above-mentioned matter, and as such am fully familiar with the facts set forth herein. I make this certification in support of the Motion to Vacate Dismissal:

1. Debtor has provided a total of \$700.00 to my office in connection with his trustee payments:
 - a. \$322.00 in connection with November 2024, December 2024 and January 2025 Trustee Payment
 - b. \$378.00 in connection with the trustee's refund to debtor
2. The funds have been deposited in my Attorney Trust Account.
3. The debtor is now current with his Trustee payments.
4. The Domestic Support Obligation information was uploaded via 13docs on August 21, 2024.
5. Homeowners insurance declaration page was uploaded via 13docs on August 21, 2024.
6. The realtor's listing agreement was uploaded via 13docs on December 27, 2024.
7. Attached hereto as **Exhibit A** is a true copy of the debtors amended Income and Expenses.
 - a. Medical expenses have reduced to due Medicaid
 - b. Child Support has reduced
 - c. IRS 2023 refund reduced due to setoff in connection with IRS debt from 2022.

8. Attached hereto as **Exhibit B** is a true copy of the modified plan to be filed treating the following

creditors:

- a. Carvana: To be surrendered (vehicle was repossessed)
 - b. Rocket Mortgage: Property to be sold (See Motion to Approve Sale “Doc 34”)
 - c. The Modified Plan proposes to pay non-exempt equity from PNC Bank Account.
9. Debtor will provide 2 months proof of income and 2024 tax returns 6 months from confirming order.
10. Attached hereto as **Exhibit C** is a true certification from the debtor regarding the transfer of Guest Drive, Morganville martial property to ex-spouse.
11. The quitclaim deed was uploaded to 13docs on September 06, 2024.

I hereby certify that the foregoing statements are true. We acknowledge that if they are found to be willfully false, we are subject to punishment.

Respectfully Submitted,

Date: December 27, 2024

/s/ Edward Hanratty
EDWARD HANRATTY, ESQ.

EXHIBIT A

Fill in this information to identify your case:

Debtor 1 CHRISTOPHER MICHAEL JANKOSKI

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: DISTRICT OF NEW JERSEY

Case number 3:24-bk-16538
(If known)

Check if this is:

- ☐ An amended filing
- ☐ A supplement showing postpetition chapter 13 income as of the following date:

MM / DD / YYYY

Official Form 106I

Schedule I: Your Income

12/15

Be as complete and accurate as possible. If two married people are filing together (Debtor 1 and Debtor 2), both are equally responsible for supplying correct information. If you are married and not filing jointly, and your spouse is living with you, include information about your spouse. If you are separated and your spouse is not filing with you, do not include information about your spouse. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Employment

		Debtor 1	Debtor 2 or non-filing spouse
1. Fill in your employment information. If you have more than one job, attach a separate page with information about additional employers. Include part-time, seasonal, or self-employed work. Occupation may include student or homemaker, if it applies.	Employment status	<input type="checkbox"/> Employed <input checked="" type="checkbox"/> Not employed	<input type="checkbox"/> Employed <input type="checkbox"/> Not employed
	Occupation	_____	_____
	Employer's name	_____	_____
	Employer's address	_____	_____
	How long employed there?	_____	_____

Part 2: Give Details About Monthly Income

Estimate monthly income as of the date you file this form. If you have nothing to report for any line, write \$0 in the space. Include your non-filing spouse unless you are separated.

If you or your non-filing spouse have more than one employer, combine the information for all employers for that person on the lines below. If you need more space, attach a separate sheet to this form.

	For Debtor 1	For Debtor 2 or non-filing spouse
2. List monthly gross wages, salary, and commissions (before all payroll deductions). If not paid monthly, calculate what the monthly wage would be.	\$ 0.00	\$ N/A
3. Estimate and list monthly overtime pay.	+\$ 0.00	+\$ N/A
4. Calculate gross income. Add line 2 + line 3.	\$ 0.00	\$ N/A

Debtor 1 CHRISTOPHER MICHAEL JANKOSKI

Case number (if known) 3:24-bk-16538

	For Debtor 1	For Debtor 2 or non-filing spouse
Copy line 4 here	4. \$ 0.00	\$ N/A
5. List all payroll deductions:		
5a. Tax, Medicare, and Social Security deductions	5a. \$ 0.00	\$ N/A
5b. Mandatory contributions for retirement plans	5b. \$ 0.00	\$ N/A
5c. Voluntary contributions for retirement plans	5c. \$ 0.00	\$ N/A
5d. Required repayments of retirement fund loans	5d. \$ 0.00	\$ N/A
5e. Insurance	5e. \$ 0.00	\$ N/A
5f. Domestic support obligations	5f. \$ 0.00	\$ N/A
5g. Union dues	5g. \$ 0.00	\$ N/A
5h. Other deductions. Specify: _____	5h.+ \$ 0.00	+ \$ N/A
6. Add the payroll deductions. Add lines 5a+5b+5c+5d+5e+5f+5g+5h.	6. \$ 0.00	\$ N/A
7. Calculate total monthly take-home pay. Subtract line 6 from line 4.	7. \$ 0.00	\$ N/A
8. List all other income regularly received:		
8a. Net income from rental property and from operating a business, profession, or farm Attach a statement for each property and business showing gross receipts, ordinary and necessary business expenses, and the total monthly net income.	8a. \$ 0.00	\$ N/A
8b. Interest and dividends	8b. \$ 0.00	\$ N/A
8c. Family support payments that you, a non-filing spouse, or a dependent regularly receive Include alimony, spousal support, child support, maintenance, divorce settlement, and property settlement.	8c. \$ 2,400.00	\$ N/A
8d. Unemployment compensation	8d. \$ 0.00	\$ N/A
8e. Social Security	8e. \$ 0.00	\$ N/A
8f. Other government assistance that you regularly receive Include cash assistance and the value (if known) of any non-cash assistance that you receive, such as food stamps (benefits under the Supplemental Nutrition Assistance Program) or housing subsidies. Specify: _____	8f. \$ 0.00	\$ N/A
8g. Pension or retirement income	8g. \$ 0.00	\$ N/A
8h. Other monthly income. Specify: TAX REFUND	8h.+ \$ 208.55	+ \$ N/A
9. Add all other income. Add lines 8a+8b+8c+8d+8e+8f+8g+8h.	9. \$ 2,608.55	\$ N/A
10. Calculate monthly income. Add line 7 + line 9. Add the entries in line 10 for Debtor 1 and Debtor 2 or non-filing spouse.	10. \$ 2,608.55 + \$ N/A = \$ 2,608.55	
11. State all other regular contributions to the expenses that you list in Schedule J. Include contributions from an unmarried partner, members of your household, your dependents, your roommates, and other friends or relatives. Do not include any amounts already included in lines 2-10 or amounts that are not available to pay expenses listed in Schedule J. Specify: _____		11. +\$ 0.00
12. Add the amount in the last column of line 10 to the amount in line 11. The result is the combined monthly income. Write that amount on the <i>Summary of Schedules</i> and <i>Statistical Summary of Certain Liabilities</i> and Related Data, if it applies		12. \$ 2,608.55 Combined monthly income
13. Do you expect an increase or decrease within the year after you file this form?		
<input checked="" type="checkbox"/> No.		
<input type="checkbox"/> Yes. Explain: _____		

Fill in this information to identify your case:	
Debtor 1	<u>CHRISTOPHER MICHAEL JANKOSKI</u>
Debtor 2 (Spouse, if filing)	<u></u>
United States Bankruptcy Court for the:	<u>DISTRICT OF NEW JERSEY</u>
Case number (If known)	<u>3:24-bk-16538</u>

Check if this is:

- ☐ An amended filing
☐ A supplement showing postpetition chapter 13 expenses as of the following date:

MM / DD / YYYY

Official Form 106J

Schedule J: Your Expenses

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach another sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Your Household

1. Is this a joint case?

- ☒ No. Go to line 2.
☐ Yes. Does Debtor 2 live in a separate household?
☐ No
☐ Yes. Debtor 2 must file Official Form 106J-2, *Expenses for Separate Household* of Debtor 2.

2. Do you have dependents? ☐ No

Do not list Debtor 1 and Debtor 2.

☒ Yes. Fill out this information for each dependent.....

Do not state the dependents names.

Dependent's relationship to Debtor 1 or Debtor 2

Dependent's age

Does dependent live with you?

Daughter

5

☒ No
☐ Yes

Daughter

3

☒ No
☐ Yes

☐ No
☐ Yes

☐ No
☐ Yes

3. Do your expenses include expenses of people other than yourself and your dependents? ☒ No
☐ Yes

Part 2: Estimate Your Ongoing Monthly Expenses

Estimate your expenses as of your bankruptcy filing date unless you are using this form as a supplement in a Chapter 13 case to report expenses as of a date after the bankruptcy is filed. If this is a supplemental *Schedule J*, check the box at the top of the form and fill in the applicable date.

Include expenses paid for with non-cash government assistance if you know the value of such assistance and have included it on *Schedule I: Your Income* (Official Form 106I.)

Your expenses

4. The rental or home ownership expenses for your residence. Include first mortgage payments and any rent for the ground or lot.

4. \$ 0.00

If not included in line 4:

4a. Real estate taxes

4a. \$ 0.00

4b. Property, homeowner's, or renter's insurance

4b. \$ 0.00

4c. Home maintenance, repair, and upkeep expenses

4c. \$ 0.00

4d. Homeowner's association or condominium dues

4d. \$ 0.00

5. Additional mortgage payments for your residence, such as home equity loans

5. \$ 0.00

6. Utilities:

6a. Electricity, heat, natural gas

6a. \$ 0.00

6b. Water, sewer, garbage collection

6b. \$ 0.00

6c. Telephone, cell phone, Internet, satellite, and cable services

6c. \$ 0.00

6d. Other. Specify: _____

6d. \$ 0.00

Debtor 1 CHRISTOPHER MICHAEL JANKOSKI

Case number (if known) 3:24-bk-16538

<p>7. Food and housekeeping supplies</p> <p>8. Childcare and children's education costs</p> <p>9. Clothing, laundry, and dry cleaning</p> <p>10. Personal care products and services</p> <p>11. Medical and dental expenses</p> <p>12. Transportation. Include gas, maintenance, bus or train fare. Do not include car payments.</p> <p>13. Entertainment, clubs, recreation, newspapers, magazines, and books</p> <p>14. Charitable contributions and religious donations</p> <p>15. Insurance. Do not include insurance deducted from your pay or included in lines 4 or 20.</p> <p>15a. Life insurance</p> <p>15b. Health insurance</p> <p>15c. Vehicle insurance</p> <p>15d. Other insurance. Specify: _____</p> <p>16. Taxes. Do not include taxes deducted from your pay or included in lines 4 or 20. Specify: _____</p> <p>17. Installment or lease payments:</p> <p>17a. Car payments for Vehicle 1</p> <p>17b. Car payments for Vehicle 2</p> <p>17c. Other. Specify: _____</p> <p>17d. Other. Specify: _____</p> <p>18. Your payments of alimony, maintenance, and support that you did not report as deducted from your pay on line 5, Schedule I, Your Income (Official Form 106I).</p> <p>19. Other payments you make to support others who do not live with you. Specify: _____</p> <p>20. Other real property expenses not included in lines 4 or 5 of this form or on Schedule I: Your Income.</p> <p>20a. Mortgages on other property</p> <p>20b. Real estate taxes</p> <p>20c. Property, homeowner's, or renter's insurance</p> <p>20d. Maintenance, repair, and upkeep expenses</p> <p>20e. Homeowner's association or condominium dues</p> <p>21. Other: Specify: _____</p> <p>22. Calculate your monthly expenses</p> <p>22a. Add lines 4 through 21.</p> <p>22b. Copy line 22 (monthly expenses for Debtor 2), if any, from Official Form 106J-2</p> <p>22c. Add line 22a and 22b. The result is your monthly expenses.</p> <p>23. Calculate your monthly net income.</p> <p>23a. Copy line 12 (<i>your combined monthly income</i>) from Schedule I.</p> <p>23b. Copy your monthly expenses from line 22c above.</p> <p>23c. Subtract your monthly expenses from your monthly income. The result is your <i>monthly net income</i>.</p> <p>24. Do you expect an increase or decrease in your expenses within the year after you file this form? For example, do you expect to finish paying for your car loan within the year or do you expect your mortgage payment to increase or decrease because of a modification to the terms of your mortgage? <input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. Explain here:</p>	<table border="0" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: right;">7. \$</td><td style="text-align: right;">458.00</td></tr> <tr><td style="text-align: right;">8. \$</td><td style="text-align: right;">900.00</td></tr> <tr><td style="text-align: right;">9. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">10. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">11. \$</td><td style="text-align: right;">504.80</td></tr> <tr><td style="text-align: right;">12. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">13. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">14. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">15a. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">15b. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">15c. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">15d. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">16. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">17a. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">17b. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">17c. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">17d. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">18. \$</td><td style="text-align: right;">600.00</td></tr> <tr><td style="text-align: right;">19. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">20a. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">20b. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">20c. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">20d. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">20e. \$</td><td style="text-align: right;">0.00</td></tr> <tr><td style="text-align: right;">21. +\$</td><td style="text-align: right;">0.00</td></tr> </table> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <table border="0" style="width: 100%;"> <tr><td style="width: 10px;">\$</td><td style="text-align: right;">2,462.80</td></tr> <tr><td style="width: 10px;">\$</td><td style="text-align: right;"> </td></tr> <tr><td style="width: 10px;">\$</td><td style="text-align: right;">2,462.80</td></tr> </table> </div> <table border="0" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: right;">23a. \$</td><td style="text-align: right;">2,608.55</td></tr> <tr><td style="text-align: right;">23b. -\$</td><td style="text-align: right;">2,462.80</td></tr> </table> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <table border="0" style="width: 100%;"> <tr><td style="width: 10px;">23c. \$</td><td style="text-align: right;">145.75</td></tr> </table> </div>	7. \$	458.00	8. \$	900.00	9. \$	0.00	10. \$	0.00	11. \$	504.80	12. \$	0.00	13. \$	0.00	14. \$	0.00	15a. \$	0.00	15b. \$	0.00	15c. \$	0.00	15d. \$	0.00	16. \$	0.00	17a. \$	0.00	17b. \$	0.00	17c. \$	0.00	17d. \$	0.00	18. \$	600.00	19. \$	0.00	20a. \$	0.00	20b. \$	0.00	20c. \$	0.00	20d. \$	0.00	20e. \$	0.00	21. +\$	0.00	\$	2,462.80	\$		\$	2,462.80	23a. \$	2,608.55	23b. -\$	2,462.80	23c. \$	145.75
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EXHIBIT B

STATISTICAL INFORMATION ONLY: Debtor must select the number of each of the following items included in the Plan.

0 Valuation of Security 0 Assumption of Executory Contract or Unexpired Lease 0 Lien Avoidance

Last revised: November 14, 2023

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
District of New Jersey**

In Re: CHRISTOPHER MICHAEL JANKOSKI

Case No.: 24-16538

Judge: MBK

Debtor(s)

CHAPTER 13 PLAN AND MOTIONS

☐ Original

☒ Modified/Notice Required

Date: DECEMBER 10, 2024

☐ Motions Included

☐ Modified/No Notice Required

THE DEBTOR HAS FILED FOR RELIEF UNDER
CHAPTER 13 OF THE BANKRUPTCY CODE.

YOUR RIGHTS WILL BE AFFECTED

The Court issued a separate Notice of the Hearing on Confirmation of Plan, which contains the date of the confirmation hearing on the Plan proposed by the Debtor. This document is the actual Plan proposed by the Debtor to adjust debts. You should read these papers carefully and discuss them with your attorney. Anyone who wishes to oppose any provision of this Plan or any motion included in it must file a written objection within the time frame stated in the Notice. Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated. This Plan may be confirmed and become binding, and included motions may be granted without further notice or hearing, unless written objection is filed before the deadline stated in the Notice. The Court may confirm this plan, if there are no timely filed objections, without further notice. See Bankruptcy Rule 3015. If this plan includes motions to avoid or modify a lien, the lien avoidance or modification may take place solely within the Chapter 13 confirmation process. The plan confirmation order alone will avoid or modify the lien. The debtor need not file a separate motion or adversary proceeding to avoid or modify a lien based on value of the collateral or to reduce the interest rate. An affected lien creditor who wishes to contest said treatment must file a timely objection and appear at the confirmation hearing to prosecute same.

The following matters may be of particular importance. Debtors must check one box on each line to state whether the plan includes each of the following items. If an item is checked as "Does Not" or if both boxes are checked, the provision will be ineffective if set out later in the plan.

THIS PLAN:

☐ DOES ☒ DOES NOT CONTAIN NON-STANDARD PROVISIONS. NON-STANDARD PROVISIONS MUST ALSO BE SET FORTH IN PART 10.

☐ DOES ☒ DOES NOT LIMIT THE AMOUNT OF A SECURED CLAIM BASED SOLELY ON VALUE OF COLLATERAL, WHICH MAY RESULT IN A PARTIAL PAYMENT OR NO PAYMENT AT ALL TO THE SECURED CREDITOR. SEE MOTIONS SET FORTH IN PART 7, IF ANY, AND SPECIFY: ☐ 7a/ ☐ 7b/ ☐ 7c.

☐ DOES ☒ DOES NOT AVOID A JUDICIAL LIEN OR NONPOSSESSORY, NONPURCHASE-MONEY SECURITY INTEREST. SEE MOTIONS SET FORTH IN PART 7, IF ANY, AND SPECIFY: ☐ 7a/ ☐ 7b/ ☐ 7c

Initial Debtor(s)' Attorney /s/ EH

Initial Debtor: /s/ CMJ

Initial Co-Debtor

Part 1: Payment and Length of Plan

- a. The debtor shall pay to the Chapter 13 Trustee **\$100.00** monthly for 60 months starting on the first of the month following the filing of the petition. (If tier payments are proposed) : and then \$_____ per month for _____ months; \$_____ per month for _____ months, for a total of 60 months.
- b. The debtor shall make plan payments to the Trustee from the following sources:
- ☒ Future Earnings
- ☐ Other sources of funding (describe source, amount and date when funds are available):
- c. Use of real property to satisfy plan obligations:
- ☒ Sale of real property
Description: 15 Sheriff Street, Freehold, NJ 07728
Rocket Mortgage

Proposed date for completion:

Closing scheduled for
December 20, 2024

☐ Refinance of real property:

Description:

Proposed date for completion:

☐ Loan modification with respect to mortgage encumbering property:

Description:

Proposed date for completion:

- d. ☐ The regular monthly mortgage payment will continue pending the sale, refinance or loan modification. See also Part 4.

☒ If a Creditor filed a claim for arrearages, the arrearages ☐ will / ☒ will not be paid by the Chapter 13 Trustee pending an Order approving sale, refinance, or loan modification of the real property.

- e. For debtors filing joint petition:

☐ Debtors propose to have the within Chapter 13 Case jointly administered. If any party objects to joint administration, an objection to confirmation must be timely filed. The objecting party must appear at confirmation to prosecute their objection.

Initial Debtor: _____ Initial Co-Debtor: _____

Part 2: Adequate Protection

X NONE

a. Adequate protection payments will be made in the amount of \$_____ to be paid to the Chapter 13 Trustee and disbursed pre-confirmation to _____ (creditor). (Adequate protection payments to be commenced upon order of the Court.)

b. Adequate protection payments will be made in the amount of \$_____ to be paid directly by the debtor(s) outside the Plan, pre-confirmation to: _____ (creditor).

Part 3: Priority Claims (Including Administrative Expenses)

- a. All allowed priority claims will be paid in full unless the creditor agrees otherwise:

Name of Creditor	Type of Priority	Amount to be Paid
CHAPTER 13 STANDING TRUSTEE	ADMINISTRATIVE	AS ALLOWED BY STATUTE
ATTORNEY FEE BALANCE	ADMINISTRATIVE	BALANCE DUE: \$0.00
DOMESTIC SUPPORT OBLIGATION		NONE-
Internal Revenue Service	Taxes and Certain Other Debts	00.00

- b. Domestic Support Obligations assigned or owed to a governmental unit and paid less than full amount:
Check one:

☒ None

☐ The allowed priority claims listed below are based on a domestic support obligation that has been assigned to or is owed to a governmental unit and will be paid less than the full amount of the claim pursuant to 11 U.S.C.1322(a)(4):

Name of Creditor	Type of Priority	Claim Amount	Amount to be Paid
------------------	------------------	--------------	-------------------

Part 4: Secured Claims

a. Curing Default and Maintaining Payments on Principal Residence: ☒ NONE

The Debtor will pay to the Trustee allowed claims for arrearages on monthly obligations and the debtor shall pay directly to the creditor monthly obligations due after the bankruptcy filing as follows:

Name of Creditor	Collateral or Type of Debt (identify property and add street address, if applicable)	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor by Trustee	Regular Monthly Payment Direct to Creditor
------------------	--	-----------	----------------------------	--	--

b. Curing and Maintaining Payments on Non-Principal Residence & other loans or rent arrears: ☒ NONE

The Debtor will pay to the Trustee allowed claims for arrearages on monthly obligations and the debtor will pay directly to the creditor monthly obligations due after the bankruptcy filing as follows:

Name of Creditor	Collateral or Type of Debt (identify property and add street address, if applicable)	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor by Trustee	Regular Monthly Payment Direct to Creditor
------------------	--	-----------	----------------------------	--	--

c. Secured claims to be paid in full through the plan which are excluded from 11 U.S.C. 506: ☒ NONE

The following claims were either incurred within 910 days before the petition date and are secured by a purchase money security interest in a motor vehicle acquired for the personal use of the debtor(s), or incurred within one year of the petition date and secured by a purchase money security interest in any other thing of value:

Name of Creditor	Collateral (identify property and add street address, if applicable)	Interest Rate	Amount of Claim	Total to be Paid Including Interest Calculation by Trustee
------------------	--	---------------	-----------------	--

d. Requests for valuation of security, Cram-down, Strip Off & Interest Rate Adjustments ☒ NONE

1.) The debtor values collateral as indicated below. If the claim may be modified under Section 1322(b)(2), the secured creditor shall be paid the amount listed as the "Value of the Creditor Interest in Collateral," plus interest as stated. The portion of any allowed claim that exceeds that value shall be treated as an unsecured claim. If a secured claim is identified as having "NO VALUE" it shall be treated as an unsecured claim.

NOTE: A modification under this Section ALSO REQUIRES the appropriate motion to be filed under Section 7 of the Plan.

Name of Creditor	Collateral (identify property and add street address, if applicable)	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor Interest in Collateral	Annual Interest Rate	Total Amount to be Paid by Trustee
------------------	--	----------------	------------------------	----------------	--	----------------------	------------------------------------

2.) Where the Debtor retains collateral and completes all Plan payments, payment of the full amount of the allowed secured claim shall discharge the corresponding lien.

e. Surrender ☐ NONE

Upon confirmation, the automatic stay is terminated as to surrendered collateral only under 11 U.S.C. 362(a) and that the stay under 11 U.S.C 1301 shall be terminated in all respects. The Debtor surrenders the following collateral:

Name of Creditor	Collateral to be Surrendered (identify property and add street address, if applicable)	Value of Surrendered Collateral	Remaining Unsecured Debt
CARVANA, LLC	2017 SUBARU CROSSTREK	UNKNOWN - VEHICLE REPOED	\$25,617.03

f. Secured Claims Unaffected by the Plan ☒ NONE

The following secured claims are unaffected by the Plan:

Name of Creditor	Collateral (identify property and add street address, if applicable)
------------------	--

g. Secured Claims to be Paid in Full Through the Plan: ☒ NONE

Name of Creditor	Collateral (identify property and add street address, if applicable)	Amount	Interest Rate	Total Amount to be Paid through the plan by Trustee

Part 5: Unsecured Claims ☒ NONE

a. Not separately classified allowed non-priority unsecured claims shall be paid:

- ☐ Not less than \$____ to be distributed *pro rata*
- ☐ Not less than ____ percent
- ☒ *Pro Rata* distribution from any remaining funds

b. Separately classified unsecured claims shall be treated as follows:

Name of Creditor	Basis for Separate Classification	Treatment	Amount to be Paid by Trustee
------------------	-----------------------------------	-----------	------------------------------

Part 6: Executory Contracts and Unexpired Leases X ☒ NONE

(NOTE: See time limitations set forth in 11 U.S.C. 365(d)(4) that may prevent assumption of non-residential real property leases in this Plan.)

All executory contracts and unexpired leases, not previously rejected by operation of law, are rejected, except the following, which are assumed:

Name of Creditor	Arrears to be Cured and paid by Trustee	Nature of Contract or Lease	Treatment by Debtor	Post-Petition Payment to be Paid Directly to Creditor by Debtor
------------------	---	-----------------------------	---------------------	---

Part 7: Motions X ☒ NONE

NOTE: All plans containing motions must be served on all affected lienholders, together with local form, Notice of

Chapter 13 Plan Transmittal, within the time and in the manner set forth in D.N.J. LBR 3015-1. A Certification of Service, Notice of Chapter 13 Plan Transmittal, and valuation must be filed with the Clerk of Court when the plan and transmittal notice are served

a. Motion to Avoid Liens under 11 U.S.C. Section 522(f). ☒ NONE

The Debtor moves to avoid the following liens that impair exemptions:

Name of Creditor	Nature of Collateral (identify property and add street address, if applicable)	Type of Lien	Amount of Lien	Value of Collateral	Amount of Claimed Exemption	Sum of All Other Liens Against the Property	Amount of Lien to be Avoided
------------------	--	--------------	----------------	---------------------	-----------------------------	---	------------------------------

b. Motion to Avoid Liens and Reclassify Claim from Secured to Completely Unsecured. ☒ NONE

The Debtor moves to reclassify the following claims as unsecured and to void liens on collateral consistent with Part 4 above:

Name of Creditor	Collateral (identify property and add street address if applicable)	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor's Interest in Collateral	Total Amount of Lien to be Reclassified
------------------	---	----------------	------------------------	----------------	--	---

c. Motion to Partially Void Liens and Reclassify Underlying Claims as Partially Secured and Partially Unsecured. ☒ NONE

The Debtor moves to reclassify the following claims as partially secured and partially unsecured, and to void liens on collateral consistent with Part 4 above:

Name of Creditor	Collateral (identify property and add street address if applicable)	Scheduled Debt	Total Collateral Value	Amount to be Deemed Secured	Amount to be Reclassified as Unsecured
------------------	---	----------------	------------------------	-----------------------------	--

d. Where the Debtor retains collateral, upon completion of the Plan and issuance of the Discharge, affected Debtor may take all steps necessary to remove of record any lien or portion of any lien discharged.

Part 8: Other Plan Provisions

a. Vesting of Property of the Estate

- ☒ Upon Confirmation
☐ Upon Discharge

b. Payment Notices

Creditors and Lessors provided for in Parts 4, 6 or 7 may continue to mail customary notices or coupons to the Debtor notwithstanding the automatic stay.

c. Order of Distribution

The Trustee shall pay allowed claims in the following order:

- 1) Chapter 13 Standing Trustee Fees, upon receipt of funds
- 2) Other Administrative Claims
- 3) Secured Claims
- 4) Lease Arrearages
- 5) Priority Claims
- 6) General Unsecured Claims

d. Post-Petition Claims

The Trustee ☐ is, ☒ is not authorized to pay post-petition claims filed pursuant to 11 U.S.C. Section 1305(a) in the amount filed by the post-petition claimant.

Part 9: Modification

NONE

NOTE: Modification of a plan does not require that a separate motion be filed. A modified plan must be served in accordance with D.N.J. LBR 3015-2.

If this Plan modifies a Plan previously filed in this case, complete the information below.

Date of Plan being modified: 06/28/2024.

Explain below **why** the plan is being modified:

Remove treatment to IRS and provide closing date for sale of property

Are Schedules I and J being filed simultaneously with this Modified Plan?

☐ Yes

☒ No

Part 10 : Non-Standard Provision(s): Signatures Required

Non-Standard Provisions Requiring Separate Signatures:

☒ NONE

☐ Explain here:

Any non-standard provisions placed elsewhere in this plan are ineffective.

Signatures

The Debtor(s) and the attorney for the Debtor(s), if any, must sign this Plan.

By signing and filing this document, the debtor(s), if not represented by an attorney, or the attorney for the debtor(s) certify that the wording and order of the provisions in this Chapter 13 Plan are identical to *Local Form, Chapter 13 Plan and Motions*.

I certify under penalty of perjury that the above is true.

Date: December 10, 2024

/s/ CHRISTOPHER MICHAEL JANKOSKI

CHRISTOPHER MICHAEL JANKOSKI

Debtor

Date: _____

Joint Debtor

Date: December 10, 2024

/s/ Edward Hanratty

Edward Hanratty

Attorney for the Debtor(s)

EXHIBIT C

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
**CAPTION IN COMPLIANCE WITH D.N.J. LBR
9004-2(C)**

THE LAW OFFICE OF EDWARD HANRATTY
EDWARD HANRATTY, ESQ. (052151997)
57 W. MAIN STREET, SUITE 2D
FREEHOLD NJ 07728
TEL: 732-866-6655

IN RE:

CHRISTOPHER MICHAEL JANKOSKI

CASE NO.: 24-16538

HEARING DATE:

JUDGE: MBK

CERTIFICATION OF DEBTOR

I am Christopher Michael Jankoski, the debtor in the above-mentioned matter, and as such am fully familiar with the facts set forth herein.

1. On or about July 26, 2023, I signed a Quit Claim Deed in connection with property located at 16 Guest Drive, Morganville, NJ 07728 **EXHIBIT A**
2. At closing I received a total amount of \$126,000.00 **EXHIBIT B**
3. I used \$109,436.29 to purchase property located at 15 Sheriff Street, Freehold, NJ 07728.
EXHIBIT C
4. The balance of \$16,563.71 were used for daily living expenses.

I hereby certify that the foregoing statements are true. We acknowledge that if they are found to be willfully false, we are subject to punishment.

Date: 12/19/24

Respectfully Submitted,

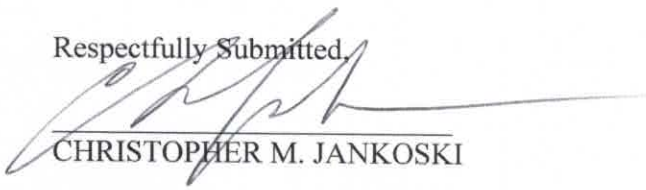

CHRISTOPHER M. JANKOSKI

EXHIBIT A

Inst. # 2023054745 - Page 1 of 9



Monmouth County Document Summary Sheet

MONMOUTH COUNTY CLERK
PO BOX 1251
MARKET YARD
FREEHOLD NJ 07728

Transaction Identification Number

6779316

8263885

Recorded Document to be Returned by Submitter to:

STEWART TITLE GUARANTY - NON CA LOANS
500 N. BROADWAY, 8TH FLOOR
ST. LOUIS, MO 63102

Official Use Only

CHRISTINE GIORDANO HANLON
COUNTY CLERK
MONMOUTH COUNTY, NJ

INSTRUMENT NUMBER

2023054745

RECORDED ON

Aug 09, 2023

12:48:52 PM

BOOK:OR-9655 PAGE:2627

Total Pages: 9

REALTY TRANSFER FEES \$1,851.50

COUNTY RECORDING FEES \$100.00

TOTAL PAID \$1,951.50

Submission Date (mm/dd/yyyy)

08/08/2023

No. of Pages (excluding Summary Sheet)

7

Recording Fee (excluding transfer tax)

\$100.00

Realty Transfer Tax

\$1,851.50

Total Amount

\$1,951.50

Document Type

DEED/NO EXEMPTION FROM REALTY TRANSFER FEE

Electronic Recordation Level

L2 - Level 2 (With Images)

Municipal Codes

MARLBORO

3001

1443606

Additional Information (Official Use Only)

*** DO NOT REMOVE THIS PAGE.**

**COVER SHEET [DOCUMENT SUMMARY FORM] IS PART OF MONMOUTH COUNTY FILING RECORD.
RETAIN THIS PAGE FOR FUTURE REFERENCE.**

Inst. # 2023054745 - Page 2 of 9



Monmouth County Document Summary Sheet

DEED/NO EXEMPTION FROM REALTY TRANSFER FEE	Type	DEED/NO EXEMPTION FROM REALTY TRANSFER FEE				
	Consideration	\$317,208.02				
	Submitted By	SIMPLIFILE, LLC. (SIMPLIFILE)				
	Document Date	08/08/2023				
	Reference Info					
	Book ID	Book	Beginning Page	Instrument No.	Recorded/File Date	
	GRANTOR	Name			Address	
		CHRISTOPHER JANKOSKI				
		JESSICA JANKOSKI				
	GRANTEE	Name			Address	
		JESSICA JANKOSKI				
	Parcel Info					
	Property Type	Tax Dist.	Block	Lot	Qualifier	Municipality
		30	275	25		3001
<p align="center">* DO NOT REMOVE THIS PAGE. COVER SHEET (DOCUMENT SUMMARY FORM) IS PART OF MONMOUTH COUNTY FILING RECORD. RETAIN THIS PAGE FOR FUTURE REFERENCE.</p>						

After Recording Return To:
Stewart
500 North Broadway Suite 900
St. Louis, MO 63102

Mail Tax Statements to:
Jessica Jankoski
16 Guest Drive
Morganville, NJ 07751-0000

Order #: WFRASM23582603
Township of Marlboro
County of Monmouth
State of New Jersey
Tax Block 275 Lot 25

QUIT CLAIM DEED

This QUIT CLAIM DEED, executed this 26th day of July, 2023, by and between JESSICA JANKOSKI, an unmarried person, whose address is 16 Guest Drive, Morganville, NJ 07751-0000, and former spouse CHRISTOPHER JANKOSKI, an unmarried person, whose address is 15 Sheriff Street, Freehold, NJ 07728, hereinafter called GRANTORS and JESSICA JANKOSKI, an unmarried person, whose address is 16 Guest Drive, Morganville, NJ 07751-0000, hereinafter called GRANTEES:

Wherever used herein the terms "GRANTORS" AND "GRANTEES" include all the party to this instrument and the heirs, legal representatives and assigns of individuals, and the successors and assigns of corporations.

Transfer of Ownership. The Grantors grant and convey (transfer ownership of) the property (called the "Property") described below to the Grantees.

Consideration. This transfer of ownership is made for the sum and consideration of \$0.00.

Tax map Reference. Municipality of the Township of Marlboro, Monmouth County, New Jersey Block No. 275 Lot No 25, Account No. _____. Commonly known as 16 Guest Drive, Morganville, NJ 07751-0000.

☐ No lot and block or account number has been assigned to the Property as of the date of this Deed.

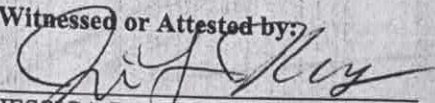
Property Description. The Property consists of the land and all the buildings, structures and improvements contained on the Property, and is located in the County of Monmouth and State of New Jersey. The legal description is:

SEE COMPLETE LEGAL ATTACHED AS EXHIBIT "A"

Type of Deed. This Deed is called a Quitclaim Deed. The Grantors make no promises as to ownership or title, but simply transfers whatever interest the Grantors have to the Grantee.

Signatures. The Grantors sign this Deed as of the date at the top of the first page.

Witnessed or Attested by:


JESSICA JANKOSKI

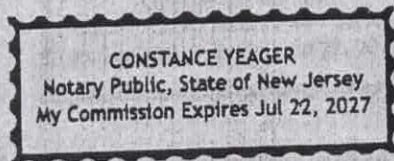
STATE OF NEW JERSEY,

COUNTY OF Monmouth SS.:

I CERTIFY that on 28th day of July, 2023, JESSICA JANKOSKI, of even date and any amendments thereto, personally came before me and stated to my satisfaction that this person (or if more than one, each person):

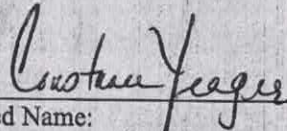
personally came before me and stated to my satisfaction that this person(s)

- (a) was the maker of the attached instrument; and,
- (b) executed this instrument as his/her/their own act.



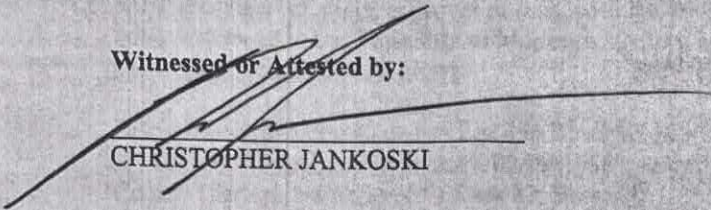
Printed Name:

Title: Notary Public


Constance Yeager

Signatures. The Grantors sign this Deed as of the date at the top of the first page.

Witnessed or Attested by:


CHRISTOPHER JANKOSKI

STATE OF NEW JERSEY,

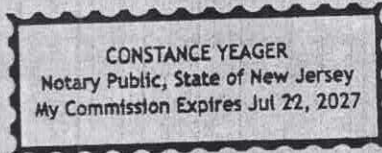
COUNTY OF Monmouth SS.:

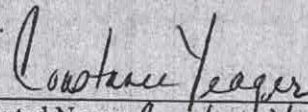
I CERTIFY that on 26th day of July, 2023, CHRISTOPHER JANKOSKI, of even date and any amendments thereto, personally came before me and stated to my satisfaction that this person (or if more than one, each person):

personally came before me and stated to my satisfaction that this person(s)

(a) was the maker of the attached instrument; and,

(b) executed this instrument as his/her/their own act.




Printed Name: Constance Yeager
Title: Notary Public

Note: Consideration Paid Is Set Forth In The Body Of The Deed. N.J.S.A. 46:15-6(a)

No title search was performed on the subject property by the preparer. The preparer of this deed makes neither representation as to the status of the title nor property use or any zoning regulations concerning described property herein conveyed nor any matter except the validity of the form of this instrument. Information herein was provided to preparer by Grantors/Grantees and /or their agents; no boundary survey was made at the time of this conveyance

Prepared By:

Robert C. Litwack, Esq.
178 Macanippuck Road
Bridgeton, NJ 08302

EXHIBIT B

EXHIBIT C

American Land Title Association

Final ALTA Settlement Statement - Combined
Adopted 05-01-2015

Weichert Title Agency
ALTA Universal ID:
1909 Route 70 East
Cherry Hill, NJ 08003

File No./Escrow No. : W544176
Print Date & Time: May 18, 2023 5:06 pm
Officer/Escrow Officer : Patricia Zonin
Settlement Location : BA's office - 1 Bethany Rd Bldg 3 Ste 45, Hazlet

Property Address: 15 Sheriff Street
Freehold, NJ 07728

Borrower: Christopher Jankoski
16 Guest Drive
Marlboro, NJ 07751

Seller: Norma Bonilla
15 Sheriff Street
Freehold, NJ 07728

Lender: Rocket Mortgage, LLC

Settlement Date: May 19, 2023
Disbursement Date: May 19, 2023

Seller		Description	Borrower	
Debit	Credit		Debit	Credit
		Financial		
		Lender Credits from Rocket Mortgage, LLC		
	465,000.00	Sale Price of Property	465,000.00	1,528.00
		Deposit		18,000.00
		Loan Amount		372,000.00
		Prorations/Adjustments		
	887.37	City/Town Taxes 05/19/23 - 06/30/23	887.37	
		Loan Charges to Rocket Mortgage, LLC		
		1% of Loan Amount (Points)	3,720.00	
		Processing Fee	1,250.00	
		Appraisal Fee to Amrock LLC	670.00	
		Credit Monitoring Service to Factual Data	4.50	
		Credit Report to Factual Data	50.00	
		Flood Certification to Corelogic	8.00	
		Flood Life of Loan Coverage to Corelogic	5.00	

Seller		Description	Borrower	
Debit	Credit		Debit	Credit
		Loan Charges to Rocket Mortgage, LLC (continued)		
		Live of Loan Tax Service to Corelogic	48.00	
		Prepaid Interest \$65.88 per day from 05/19/23 to 06/01/23 Rocket Mortgage, LLC	856.44	
		Other Loan Charges		
		Notary Fee to Patricia Zonin	25.00	
		Impounds		
		Homeowner's Insurance to Rocket Mortgage, LLC 3.000 months at \$168.67/month	506.01	
		City/Town Taxes to Rocket Mortgage, LLC 4.000 months at \$620.48/month	2,481.92	
		Aggregate Adjustment to Rocket Mortgage, LLC		337.34
		Title Charges and Escrow/Settlement Charges		
		(Survey) to Weichert Title Agency	25.00	
		ALTA 8.1-06 (Environmental Protection Lien (New Jersey Variation)) to Weichert Title Agency	25.00	
		ALTA 9.3-06 (Restrictions, Encroachments, Minerals - Loan Policy) to Weichert Title Agency	25.00	
		Closing Service Letter to Fidelity National Title Insurance Company	75.00	
		Copies to Weichert Title Agency	5.00	
		County Clerk Search to Weichert Title Agency	195.00	
		Document Handling to Weichert Title Agency	15.00	
		Electronic Doc Transmission to Weichert Title Agency	25.00	
		Examination Charge to Weichert Title Agency	100.00	
		Lender's Title Insurance to Weichert Title Agency Coverage: 372,000.00 Premium: 25.00	25.00	
		New Jersey Superior Court Search to Weichert Title Agency	24.00	
		Notice of Settlement Filing to Weichert Title Agency	40.00	
		Overnight Fee to Weichert Title Agency	40.00	
		Post Closing Continuation Search to Weichert Title Agency	10.00	
		Post Closing Processing Fee to Weichert Title Agency	100.00	
		Settlement Fee to Weichert Title Agency	490.00	
		Simultaneous Issue Fee to Weichert Title Agency	25.00	
		Tax and Assessment Search to Weichert Title Agency	42.00	


Seller		Description	Borrower	
Debit	Credit		Debit	Credit
		Title Charges and Escrow/Settlement Charges (continued)		
		Tideland Search to Weichert Title Agency	40.00	
		Buyer's Attorney's Costs Fee to Valerie F. Avrin, Esq.	150.00	
		Buyer's Attorney's Legal Fee to Valerie F. Avrin, Esq.	1,300.00	
70.00		Seller's Attorney's Costs Fee to Jeffrey Lehman, Esq.		
2,795.00		Seller's Attorney's Legal Fee to Jeffrey Lehman, Esq.		
		Owner's Title Insurance to Weichert Title Agency Coverage: 465,000.00 Premium: 2,492.00	2,492.00	
14.00		Wire Fee - Proceeds and Payoff to Weichert Title Agency		
		Commissions		
9,500.00		Real Estate Commission - Listing Agent to Exp Realty, LLC Exp Realty, LLC		
9,100.00		Real Estate Commission - Selling Agent to Weichert Realtors - Holmdel Note: Includes adjustment of (\$200.00) for MLS Fee Weichert Realtors - Holmdel		
		Government Recording and Transfer Charges		
1,774.50		Recording Fees to Clerk of Monmouth County	358.00	
		Transfer Tax to Clerk of Monmouth County		
		Payoff(s)		
43,954.33		Payoff of First Mortgage Loan to NewRez Loan Payoff 43,936.57 Additional Interest From: 16.18 05/22/23 Through: 05/19/23 @ 8.090000 Per Diem plus 2 Extra Days Wire Fee 1.58 Total Payoff <u>43,954.33</u>		
		Miscellaneous		
		Homeowner's Insurance Premium 12 months \$660.61 paid outside closing by Borrower	1,363.39	
		Property Taxes - 2nd Qtr to Freehold Borough \$1,861.44 paid outside closing by Seller		

Seller		Description	Borrower	
Debit	Credit		Debit	Credit
		Miscellaneous (continued)		
112.22		Final Water Reading to Borough of Freehold Water and sewer		
		Survey Invoice to Morgan Engineering and Surveying	800.00	
		Good Faith Deposit		500.00
Seller		Description	Borrower	
Debit	Credit		Debit	Credit
67,320.05	465,887.37	Subtotals	483,301.63	392,365.34
		Due from Borrower		90,936.29
398,567.32		Due to Seller		
465,887.37	465,887.37	Totals	483,301.63	483,301.63

Acknowledgement

We/I have carefully reviewed the ALTA Settlement Statement and find it to be a true and accurate statement of all receipts and disbursements made on my account or by me in this transaction and further certify that I have received a copy of the ALTA Settlement Statement. We/I authorize Weichert Title Agency to cause the funds to be disbursed in accordance with this statement.

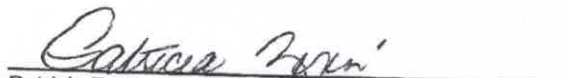
Borrower


Christopher Jankoski

Seller


Norma Bonilla

By: Jeffrey M. Lehman, as attorney in fact


Patricia Zonin
Settlement Officer